principal case had in mind a submission to a show of force appears from its consideration of the evidence. To call a submission to a show of force consent is a misuse of terms, and the further statement that consent is no defense to an action of false imprisonment was unnecessary to the decision of the case and is not sustained by the authorities.

INJUNCTION—RIGHT OF ATTORNEY TO CONSULT WITH CLIENT CONFINED IN JAIL.—A client of P, an attorney, was confined in a county jail. Notwithstanding P's repeated efforts to see her, D, the sheriff in charge of the jail, arbitrarily refused to permit P to see or consult with her client. On a petition for an injunction against D, the court *held* that an attorney has the right to be allowed, without undue or arbitrary restraint, to consult with clients confined in a jail, and that an injunction may be granted to enforce the right. *Wilmans* v. *Harston* (Tex., 1921), 234 S. W. 233.

A person confined in jail clearly has the right to consult with his attorney at reasonable times. *State* v. *Davis,* 9 Okla. Cr. Rep. 94; *People* v. *Risely,* 1 N. Y. Cr. Rep. 492; *Hamilton* v. *State,* 68 Tex. Cr. Rep. 419 (involving a statute). But see *Kinloch* v. *Harvey,* 11 S. C. 326. It would seem that an attorney had a reciprocal right to see his client, and it has been so held. *In the Matter of the Sheriff, etc.,* 1 Wheeler Cr. Cas. (N. Y.) 303. The principal case clearly states this right, but the report does not show on what basis the court took jurisdiction to enforce the right by injunction. Assuming the general rule to be that injunctions are only granted when a right of property is involved (but see 29 HARV. L. REV. 640), it would seem, nevertheless, that such a right was clearly present here. "The right of a citizen to pursue any calling, business, or profession he may choose is a property right to be guarded by equity as zealously as any other form of property." *New Method Laundry Co.* v. *MacCann,* 174 Cal. 26. An attorney's right to his clientele and to carry on his profession is one of substance, and a direct violation of that right, like that in the principal case, would obviously result in a certain pecuniary loss to him. Equity may refuse to enjoin an injury to reputation only. *Mead* v. *Stirling,* 62 Conn. 586; *Judson* v. *Zurhorst,* 30 Ohio C. C. 9. But courts of equity have often gone much farther than the principal case in finding a property right on which to base their jurisdiction, as when the publication of private letters is restrained, *Gee* v. *Pritchard,* 2 Swanston's Rep. 402; *Woolsey* v. *Judd,* 4 Duer (N. Y.) 379; or a birth certificate cancelled. *Vanderbilt* v. *Mitchell,* 72 N. J. Eq. 910. See also cases collected in note to *Ex parte Badger,* 14 A. L. R. 286. While the principal case seems to be without direct precedent, it is submitted that the holding is a correct one and is no departure from the established fields of equity jurisdiction.

INJUNCTION—WASTE—BALANCE OF INJURY.—There was a devise of a portion of an estate to the defendant for life, with remainder to the heirs of his body, and if there should be no heirs of his body, remainder to the plaintiff. The defendant joined with his nine children in mortgaging the